

EXHIBIT “D”

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

YEKUSIEL SEBROW, an individual; on behalf
of himself and all others similarly situated,

Plaintiffs,

vs.

FULTON, FRIEDMAN, & GULLACE, LLP, a
New York Limited Liability Partnership;
THOMAS MCCARTHY, individually and in
his official capacity; JASON P. VERHAGEN,
individually and in his official capacity;
MARIA J. REED, individually and in her
official capacity; PATRICIA A. BLAIR,
individually and in her official capacity;
DANTE GULLACE, individually and in his
official capacity; CYNTHIA L. FULTON,
individually and in her official capacity;
ALLAN J. FRIEDMAN, individually and in his
official capacity; and JOHN AND JANE DOES
NUMBERS 8 THROUGH 25,

Defendants.

CASE NO.: 1:10-cv-05897-DLI-RER

**DECLARATION OF ABRAHAM
KLEINMAN IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT AGREEMENT**

I, Abraham Kleinman, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New York and the Bar of this Court. I have been retained to serve as co-counsel for Plaintiff, Yekusiel Sebrow, in this action. As such, I am familiar with all of the facts set forth herein and state them to be true.
2. I have been admitted to practice law in the State of New York since 1999 and have remained a member in good standing since that time. I am also admitted to practice law before the United States District Courts for the Eastern District of New York, Southern District of New York, and Western District of New York.
3. I am the principal of Kleinman, LLC.

4. I am a graduate of the Touro College Jacob D. Fuchsberg Law Center.

5. My professional career has concentrated in consumer litigation and consumer class actions, with an emphasis claims involving the Truth in Lending Act, Fair Debt Collection Practices Act, and the Fair Credit Reporting Act. In connection with my professional activities, I am a member of the New York State Bar Association, American Bar Association, and the National Association of Consumer Advocates.

6. I was appointed sole class counsel in the matter of *John Duffy III v. Oliphant Financial, LLC*, U.S. District Court, E.D.N.Y. Case No. 2:07-cv-03657-DRH-AKT, and was recently approved as co-class counsel in the matter of *Zirotiannis v. Professional Recovery Consultants, Inc.*, U.S. District Court, E.D.N.Y. Case No. 2:11-cv-00887-LDW-ETB.

In accordance with 28 U.S.C. §1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 1st day of August 2012, at Uniondale, New York.

s/Abraham Kleinman

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One of the Attorneys for Plaintiff, Yekusiel Sebwrow and all others similarly situated